# City of Alexandria, Virginia

#### **MEMORANDUM**

DATE: AUGUST 9, 2022

TO: KATE GARVEY, DIRECTOR DEPARTMENT OF COMMUNITY AND

**HUMAN SERVICES** 

FROM: ROBERT SNYDER, CHIEF INTERNAL AUDITOR

THROUGH: KUSH PATEL, INTERNAL AUDITOR

SUBJECT: WIOA PROGRAM COMPLIANCE REVIEW – PROGRAM YEAR 2021

#### **Background**

The City of Alexandria in conjunction with Arlington County operate job centers under the auspices of the Workforce Innovation and Opportunity Act (WIOA). The WIOA program enables workers to enhance their employment prospects by providing job search assistance and training opportunities. The Alexandria/Arlington Workforce Council (AARWC) oversees the job centers and is required to conduct monitoring and oversight functions due to provisions of the WIOA. The AARWC complies with the monitoring and oversight functions by contracting with RISE Talent Solutions to perform an annual program compliance review for the Alexandria Workforce Development Center (WDC). The program compliance review sets the stage for other federal or state monitoring visits such as the Supplemental Nutrition Assistance Program Education and Training (SNAPET) monitoring review.

## **Current Operating Environment**

Interviews with WDC leadership indicated that the case manager's interaction with the client is critical to the successful operation of the WIOA program. The case manager is responsible for uploading the required documentation into the case file system which supports compliance requirements. Currently the program has around 125-135 clients and are currently processing another 20. The pandemic and "great resignation" created additional challenges for the WDC. Normally they staff five (5) case managers but had experienced significant staff turnover during the program year resulting in almost double the workload for the case managers. WDC leadership indicated that many of the staffing challenges have since been resolved.

# **Audit Summary**

We analyzed the program compliance review report and compared the Corrective Action Plan (CAP) to earlier reports issued to the WDC. There were 16 findings with 6 different case managers or clients. Of the 16 findings all but one of them dealt with documentation in the case file system. Regarding documentation all findings involved either lack of case notes or lack of documentation of skills/training. The other finding dealt with client training activity being unallowable due to unmet prerequisites. The findings agree with comments made by WDC leadership involving the staffing challenges during the pandemic. WDC leadership also indicated that they had hired a WIOA Program Manager with quality assurance background to assist with the program. WDC has completed all actions related to the findings in the compliance review.

# Workforce Innovation and Opportunity Act Program Compliance Review of Services Provided by Workforce Development Center for Program Year 2021 (July 2021 to June 2022)

Prepared by:

Barbara Walker, Alamelu Deivanayagam

Date: 4/3/2022

One Stop Operator
RISE Talent Solutions
<a href="https://www.riseglobaltalent.com">www.riseglobaltalent.com</a>
<a href="mailto:alamelu@riseglobaltalent.com">alamelu@riseglobaltalent.com</a>
571-344-0981



#### **OVERVIEW**

The Alexandria/Arlington Regional Workforce Council (AARWC) serves as the local Workforce Development Board under the federal Workforce Innovation and Opportunity Act (WIOA). The Council provides oversight over WIOA services at the region's two American Job Centers, the Alexandria Workforce Development Center and the Arlington Employment Center. These services include financial support for college tuition and vocational certifications, subsidies for transportation, books and fees while in school, and uniforms for employment. These services include support with searching for employment, researching training options, and additional support during enrollment and program participation. Also, this statement mentions fiscal services but the document does not show a space for fiscal monitoring to be conducted.

According to WIOA sec.107 (d)(8) Local Workforce Development Areas (LWDA), in partnership with the local Chief Elected Officials (CEOS), are charged with monitoring and oversight of WIOA programs and contractors / service providers on an annual basis to ensure compliance with federal, state and local statutory or regulatory requirements.

RISE Talent Solutions as the One Stop Operator conducts the required annual local monitoring for the Alexandria / Arlington Regional Workforce Council per the <u>AARWC's Compliance Monitoring Policy.</u>

#### Purpose of the Review

During the period of January – March 2022, the team from RISE conducted virtual monitoring for at both centers – AEC and WDC.

The purpose of the review was to determine whether procedures are in place to ensure compliance with the Workforce Innovation and Opportunity Act of 2014 (WIOA) and to identify areas in which technical assistance and or revisions of policy / process is needed to ensure needs of customers are met.

The following pages include detailed information on the findings, concerns and considerations of the annual compliance review. If the review team identified a finding or concern, then a detailed description of the issue is provided for the Workforce center to take appropriate corrective action. For this report, the following describes the difference between findings that require action and concerns with recommendations.

- <u>Finding</u>: Findings indicate that the area is out of compliance with current federal laws/regulations or state and local policies. Each finding requires corrective action by the Workforce center to ensure compliance.
- <u>Concern</u>: Concerns identify a potential risk to the Workforce center and may result in a future finding if the issue is not addressed. Although concerns do not indicate the Workforce center is out of compliance, recommendations or required corrective actions maybe be provided to improve services.
- Consideration: Considerations indicate an area identified that would be a benefit to the workforce center to review the policies and practices / improve effectiveness to better meet needs of customers.

#### Scope of the review:

The tool utilized for the Programmatic review was VCCS's updated monitoring tool for PY 2018. The review may cover the following policy areas of the WIOA Adult and Dislocated worker programs:

- Program eligibility
- Priority Population Barriers
- Self-Sufficiency
- Veterans Priority
- Adult Priority of Service
- Required Forms
- Basic Career Services
- Individual Career Services
- Work Experience
- Transitional Jobs
- Training Services
- Registered Apprentice
- Adult Education & Literacy
- Contract Training
- Support Services
- Measurable Skills Gain
- Credential Attainment
- Follow-up Services
- Program Exit/Performance Accountability
- Quarterly Follow-ups

#### The review covered the following policy areas of the WIOA Youth program:

- Program eligibility
- Required forms
- Objective assessment / ISS
- Work experience
- Occupations skills Training
- Support Services
- Measurable Skills Gain
- Program closure
- Follow-up Services
- Quarterly Follow-ups

#### Information / Documents Used for Programmatic review

- AARWC WIOA policies
- Virginia Workforce Connection System of Record
- VCCS PY 18 monitoring tool for WIOA Participant review for Adult, Dislocated worker and Youth
- VCCS Virginia Workforce Letters
- WIOA Program electronic case files

# **WIOA YOUTH Program review:**

State ID	Status	Policy Area	Review	Description of issue /	
Ctato ID	Cidido	. Olloy Alou	outcome	policy violation	Action Taken
3499797	Open	PROGRAM ELIGIBILITY DETERMINATION  WIOA sec. 3(24)(I), WIOA Sec 129 (B) and ( C ) LWDA Plan, Local Policies, TEGL 21-16	Concern	Case Note ID 8789613 indicates that the participant is disabled but there is no signature of a parent or legal guardian on the application.  However in the WIOA application (saved in Documents) disability is marked as "no".	Client was registered at the age of 21 and therefore did not need the signature of a parent or legal guardian on the application. Case manager added a note that included his IEP. Case manager will be sure to be more thorough in the future when completing the WIOA documentation. New note providing additional information was added on 5/19/22
			Concern	WIOA application does not list HS, although a HS IEP was found in the case file. The signed application does not indicate whether participant Qualifies as 5%.	Case manager added case note dated 5/19/22 which provides clarification on 5% and adds the clients HS.
		INDIVIDUAL SERVICE STRATEGY (ISS) WIOA sec. 129 (c) (A), 20 CFR 681.420-460, TEGL 21-16	Finding	Only high school IEP is saved. While case notes detail objective assessment no current IEP or ISS signed by participant on case file.	IEP signed on 5/20/22 by client. This client began getting enrolled by a previous caseworker who no longer works at WDC. Working to address capacity challenges so that in the future when staff leave there will be quality assurance measures in place for warm hand offs of cases.

		Monitor note:	Case Manager provided detailed assistance and timely case notes according to local policy. This participant is on track to exit with employment at place of WE.	
3501160	INDIVIDUAL SERVICE STRATEGY (ISS) WIOA sec. 129 (c) (A), 20 CFR 681.420-460, TEGL 21-16	Finding	While detailed case notes by case manager are available on service strategies discussed there is no IEP or ISS found on case file that details comprehensive goals signed off by the participant.	IEP was created and signed by client on 5/20/22. In the future Quality Assurance measures we be sure that all case managers complete IEP/ISS within 30 days of enrolling a client into WIOA and will also be sure to obtain clients signature on IEP/ISS.
		Monitor note:	Overall Case manager provided timely and relevant assistance and participant successfully completed WE.	N/A

# **WIOA DISLOCATED WORKER Review:**

State ID	Status	Policy Area	Review outcome	Description of issue / policy violation	Action Taken
3333421	Open	LOCAL CASE MANAGEMENT & CASE NOTES POLICY  Notes must be recorded in database system within 10 days (if	Finding	While the case manager has been in contact with Client, case notes have not been uploaded in a timely manner for the whole of 2021.	Additional QA measures will be put in place on a monthly basis to ensure case notes are being documents at minimum on a monthly basis. Follow up with staff who are 10 days

not coonsul after	T	Coop notes and	lata antorias sass
not sooner) after		Case notes not recorded in database	late entering case
meeting with customer			notes will be required to attend a
Customer		system within 10 days:	training on timely
		Case Note ID:	documentation. If
		8534709	this persists
		Contact Date:	additional corrective
		1/27/2021	action will be
		Create Date:	implemented.
		4/8/2021	piomontoai
		Case Note ID:	
		8534775	
		Contact Date:	
		2/11/2021	
		Create Date:	
		4/8/2021	
		0 11 / 15	
		Case Note ID:	
		8680678	
		Contact Date:	
		3/29/2021	
		Create Date: 6/15/2021	
		0/13/2021	
		Case Note ID:	
		8680603	
		Contact Date:	
		4/8/2021	
		Create Date:	
		6/15/2021	
		Case Note ID:	
		8680672	
		Contact Date:	
		4/15/2021	
		Create Date:	
		6/15/2021	
		Case Note ID:	
		8680647	
		Contact Date:	
		4/15/2021	
		Create Date:	
		6/15/2021	
		Case Note ID:	
		8680617	
		Contact Date:	
		4/15/2021	
		Create Date:	
		6/15/2021	
		Case Note ID:	
		8680717	
L		0000717	

	Contact Date:
	4/16/2021
	Create Date:
	6/15/2021
	Case Note ID:
	8680724
	Contact Date:
	4/26/2021
	Create Date:
	6/15/2021
	Casa Nata ID:
	Case Note ID: 8680730
	Contact Date:
	4/30/2021
	Create Date:
	6/15/2021
	Case Note ID:
	8680797 Contact Date:
	5/26/2021
	Create Date:
	6/15/2021
	Case Note ID:
	8766569
	Contact Date:
	7/5/2021 Create Date:
	8/6/2021
	0,0,2021
	Case Note ID:
	8766575
	Contact Date:
	7/9/2021
	Create Date: 8/6/2021
	0/0/2021
	Case Note ID:
	9127671
	Contact Date:
	8/11/2021
	Create Date:
	1/20/2022
	Case Note ID:
	9127672
	Contact Date:
	9/17/2021
	Create Date:
	1/20/2022
	Case Note ID:
	9127673
	3141013

			Contact Date:	
			10/29/2021 Create Date: 1/20/2022	
			Case Note ID: 9127674 Contact Date: 12/9/2021 Create Date: 1/20/2022	
			Case Note ID: 9127675 Contact Date: 12/14/2021 Create Date: 1/20/2022	
			Case Note ID: 9127676 Contact Date: 12/16/2021 Create Date: 1/20/2022	
	PROGRAM ELIGIBILITY	Finding	Eligibility summary in VaWC notes the Client is eligible for both Adult and Dislocated worker. Client is a Dislocated worker.	N/A
	INDIVIDUALIZED CAREER SERVICES	Finding	No ITA or PO noting approval of the MedCerts training program is listed in the VaWC as supporting documentation. Concern: Case Note Id: 9127675 notes the following.	In the future will be sure to note approval of MedCerts training program listed in VaWC as supporting documentation. Training appovals will also be added to the QA process.
			12/14/21: Received a call from Medcerts and Client asking whether WIOA could fund a BLS certification and scrubs. Sent information on eligibility requirements to use ARPA funding for these services and Client used her full	то по чл ргосезз.

		\$3500 on the Medcerts course. Client will get back to me if she wants funding support for these items. No supporting documentation to verify that \$3500 was used by Client.	
MEASUREABLE SKILLS GAIN 2 CFR 200.400	Finding	The final report showing all assessment results for the completed training course resulting in the measurable skills gained was not found in the case file, although a progress report was found showing partial completion assessment scores.	Will note measurable skills gained in VaWC in future along with progress report and necessary assessment scores. Measurable skill gain monitoring is being added to monthly quality assurance measures.
CREDENTIAL ATTAINMENT TEGL 10-16, Federal Data Validation Requirements, WIOA SEC 116	Finding	No credential attainment was entered in VaWC for the Medcerts program.  Case notes note id # 9127674 notes the MedCerts program was completed.	Entered credential attainment in VaWC.  Will enter credential attainment in VaWC in the future.
INDIVIDUALIZED CAREER SERVICES	Concern	The LMI research for the Medical Assistant job notes salary of 26,081, which is lower than self-sufficient employment. The goal of the IEP should be to help the Client obtain self-sufficient employment.	Will make necessary correction to be sure that the salary will lead to self sufficient employment. LMI note has been corrected and updatd in VaWC.
INDIVIDUALIZED CAREER SERVICES	Concern	IEP notes short-term employment as a waitress. There is no employment goal linked to the Medcerts program that the WIOA DW Training funds. This has impacted case management as case manager only reached	Reviewed IEP to close previous goals but unable to add new employment short term as case has exited. Put in request to reopen case as client continues to receive employment

			two months after Client completed Medcerts program to check if Client has obtained employment, and subsequently connected them to the Business services team to assist.	services. If case is reopened will update employment goal and link it to Medcerts program.
	File name	Consideration	Document name an tag inaccurate. Document name notes "Certificate CMAA.pdf" however document tag notes "CCMA".	Necessary tages have been updated in system. Will create handout for staff to learn how to accurately lable documents.

# **WIOA ADULT Review:**

State ID	Status	Policy Area	Review outcome	Description of issue / policy violation	Action Taken
1031300	Exited	LOCAL CASE MANAGEMENT & CASE NOTES POLICY  Notes must be recorded in database system within 10 days (if not sooner) after meeting with customer	Finding	Case notes not recorded in database system within 10 days: Case Note ID: 90861 33 Contact Date: 8/2/20 21 Create Date: 12/21/ 2021  Case Note ID: 90861 28 Contact Date: 8/10/2 021 Create Date: 12/21/ 2021  Create Date: 90861 30	CM reviewed and will be sure to practice local case management and case note policy regarding timeliness (within 10 days) of data entry. This is being added to QA process.

PROGRAM ELIGIBILITY DETERMINATION  29 USC 2939(h), 50 U.S.C. App. 453 WIOA Sec.189(h), TEGL No. 11-11, change 2, and VWI 15-02 Attachment	Consideration	Contact Date: 9/17/2 021 Create Date: 12/21/ 2021 Case Note ID: 90861 36 Contact Date: 10/29/ 2021 Create Date: 12/21/ 2021 Case Note ID: 90861 40 Contact Date: 11/30/ 2021 Create Date: 11/30/ 2021 Create Date: 12/21/ 2021 Case Note ID: 90861 40 Contact Date: 12/21/ 2021 Create Date: 12/21/ 2021 Case Note ID: 90861 23 Contact Date: 12/2/2 021 Create Date: 12/2/2 021 Create Date: 12/2/2 021 Selective Service was verified by telephone, however the verification document was not signed and dated by case	Case Manager signed the telephone verification document and uploaded into VOS
App. 453 WIOA Sec.189(h),		was not signed and	
TRAINING SERVICES  20 CFR 680.410-420, WIOA Sec. 122 (b)(1)(D), WIOA Sec. 122 (b)(4)(A), WIOA Sec. 122 (a)(3),	Finding	There is no documentation in the case file to support ITA costs.	This was a GoVA client and the information that I need is in old staff's case file. Reached out to finance for supportive documentation.Will

					do additional follow up by 5/27/22
		Priority of Service	Finding	No Priority of Service form was noted in VaWC.	Priority of Service form has upload into VOS
2171677	Active	PROGRAM ELIGIBILITY DETERMINATION  The WIOA programs application date to match the application date entered into the VaWC.	Concern	The WIOA programs application was not found in database system Unable to determine whether date on WIOA programs application matches the date entered in the VaWC	WIOA Application has been uploaded into VOS
2328014	Open	TRAINING SERVICES  20 CFR Part 680 Sections 200 - 230, TEGL 19-16  ADULT EDUCATION AND LITERACY ACTIVITIES  20. CFR 680.350, WIOA Sec. 134(c)(3)(D)(X)	Concern	Training service was not provided to participant concurrent with GED prep.  Finding: AEL was not done in coordination with an allowable training activity. The participant was enrolled in GED program as prerequisite to Administrative Assistant Training. The case notes indicate that participant has enrolled in GED prep three times and has yet to pass the GED exam. No training was offered during this period.	In the future provide the client with training concurrent with GED prep.  CM will follow the guideline for coordinating AEL enrollment in according with training activity not as a prerequisite.  Will provide update at next WIOA team meeting so other staff to not make the mistake.

		ADULT EDUCATION AND LITERACY ACTIVITIES  20. CFR 680.350, WIOA Sec. 134(c)(3)(D)(X)	Concern	The IEP was created and started on 1/9/2020. All completion and review dates in the IEP were in 2020 although the document was signed 1/9/21. The effective date for the only PO for the GED prep program payment is 1/11/21. An updated IEP with new dates for goal completion should be in file.	Will be sure to follow policies and procedures moving forward regarding IEP's. Addinging this to the QA process.
		AARWC WIOA Local Policy  – Priority of Service	Finding	No documentation to support whether priority of service was considered for Title 1 WIOA Adult. No priority of service form on file	Priority of Service form has been uploaded into VOS.
2419609	Closed	WIOA Title I VaWC Document Naming Conventions	Consideration	Document containing Supportive Services documentation tagged incorrectly:  Document Name: Fileformatsection5.pdf Document Tags: File Format Section 5: Client Resume	File name changed updated to "Supportive Services"
		BASIC CAREER SERVICES (that trigger participation only)  20 CFR 678.430, 20 CFR 680.150, TEGL 03-15, WIOA Section 134 (c)(2)(A)(i)-(xi), TEGL 19-16	Finding	No adult basic service activity entered although participant received supported services for work clothes.	Work clothes was paid through youth services. Code added for youth services. Will be sure to add this to case note documentation in the future.
		INDIVIDUALIZED CAREER SERVICES  20 CFR 678.430, WIOA Section 134 (c)(2)(A)(xii) and TEGL 03-15	Finding	IEP not found in case file although code 205 was entered in the system.	IEP was completed will be sure to follow policies and procedures regarding IEP in the future.
		WORK EXPERIENCE/INTERNSHIP	Finding	No WEX Training agreement found in case file.	Case Manager uploaded agreement 5/23/2022. Will

20 CFR Sec. 680.180,			make it a point to
680.190, 680.195 and 680.200, WIOA sec. 134(c)(2)(A)(xii)(VII), WIOA sec 134(d)(5), and Local Workforce Service Plan			upload all agreement in the future.
WORK EXPERIENCE/INTERNSHIP  20 CFR Sec. 680.180, 680.190, 680.195 and 680.200, WIOA sec. 134(c)(2)(A)(xii)(VII), WIOA sec 134(d)(5), Local Workforce Service Plan and WE contract agreement	Finding	Finding: No IEP found in case file.	Case manager has copy of agreement to be uploaded by 5/23/22.
TRAINING SERVICES  20 CFR Part 680 Sections 200 - 230, TEGL 19-16	Concern	No training service was provided to participant.	Client prematurely left program and was not there long enough for training. Case noted.
SUPPORTIVE SERVICES  20 CFR 680.900-970, WIOA Sec. 3 (59) and Sec. 134(d)(2)	Finding	No Supportive Service code entered in VaWC although documentation was found in case file.	Supportive service code added.
20 CFR 677.155, TEGL 10- 16	Concern	Without a WE Training Agreement, it would not be possible to measure skills gain had participant completed the WE.	WEX Training Agreement added 5/23/22.
MEASUREABLE SKILLS GAIN 20 CFR 677.155, TEGL 10- 16 Rationale: To determine if the individual has completed a reported benchmark or exited and has passed reporting quarters for any other measures."	Concern	No measurable skills gain or credential attained.	Client did not stay in WEX for an extended period for measurable skills gained. Case noted.
	Monitor Note:	From the consecutive case note #'s 8521456 and 8607680, it does not appear that the participant given the opportunity to develop an IEP and set goals with the case manager prior to being given a WE. The participant did not complete the WE, and did not	Will be sure to incorporate additional monitoring in future to be sure that this does not happen.

	i	continue participation in the program. This Client	
		transitioned from	
	'	Youth to Adult.	

## **Overall Summary:**

Title 1 Adult IEPs are mostly well written and timely services provided. Suggestions are for

- 1. Title 1 DW IEP to include an employment goal linked to the new occupation that the Client is transitioning.
- 2. Youth to have detailed ISS / IEP in place similar to the Title 1 Adult clients
- 3. For Clients with many barriers, the Case manager should consider pre-determined meetings instead of an email check-in. Having set meetings allows Case managers to build rapport and take a coaching approach to improve client engagement. The pattern seems to be that once Client obtains training certification / short-term employment, they are not responsive to Case managers.

# Corrective Action Plan (CAP) for Local Area Monitoring of PY 20

This CAP summarizes the findings noted in the Local Area Monitoring report. Note: Column on expected completion date is for the AJC (American Job Center) to complete within 30 days of submission of the Monitoring report.

S.No.	State ID	Status of Client	Policy Area*	Description of issue	Required corrective action	Expected completion date	AJC actions taken
1	3499797	Active	INDIVIDUAL SERVICE STRATEGY (ISS) WIOA sec. 129 (c) (A), 20 CFR 681.420- 460, TEGL 21- 16	Only high school IEP is saved. While case notes detail objective assessment no current IEP or ISS signed by participant on case file.	Case manager and participant to develop and sign off on an ISS. DC	May 20 <sup>th</sup> 2022	5/21/2022
2	3501160	Active	INDIVIDUAL SERVICE STRATEGY (ISS) WIOA sec. 129 (c) (A), 20 CFR 681.420- 460, TEGL 21- 16	While detailed case notes by case manager are available on service strategies discussed there is no IEP or ISS found on case file that details comprehensive goals signed off by the participant.	Case manager and participant to develop and sign off on an ISS. DC	May 20 <sup>th</sup> 2022	5/21/2022
3	3333421	Open	LOCAL CASE MANAGEMEN T & CASE NOTES POLICY	While the case manager has been in contact with Client, case notes have not been uploaded in a timely manner for the whole of 2021.	Note to be made that this finding was noted for future monitoring purposes.	May 20th 2022	5/15/2022

			Notes must be recorded in database system within 10 days (if not sooner) after meeting with Customer				
4	3333421	Open	PROGRAM ELIGIBILITY	Eligibility summary in VaWC notes the Client is eligible for both Adult and Dislocated worker. Client is a Dislocated worker.	The correction to be noted to VaWC.	May 20 <sup>th</sup> 2022	CASE IS CLOSED BUT ADDED A CASE NOTE WITH THE CORRECTION. 5/15/2022
5	3333421	Open	INDIVIDUALIZ ED CAREER SERVICES	No ITA or PO noting approval of the MedCerts training program is listed in the VaWC as supporting documentation.  Concern: Case Note Id: 9127675 notes the following.  12/14/21: Received a call from Medcerts and Client asking whether WIOA could fund a BLS certification and scrubs. Sent information on eligibility requirements to use ARPA funding for these services and Client used her full \$3500 on the Medcerts course. Client will get back to me if she wants funding support for these items.  No supporting documentation to verify that \$3500 was used by Client.	ITA be saved to case file in VaWC.	May 20 <sup>th</sup> 2022	PO ADDED 5/15/2022

6	3333421	Open	MEASUREAB LE SKILLS GAIN 2 CFR 200.400	The final report showing all assessment results for the completed training course resulting in the measurable skills gained was not found in the case file, although a progress report was found showing partial completion assessment scores.	Measurable skills gain documentation to be uploaded to VaWC.	May 20 <sup>th</sup> 2022	Added 5/15/2022
7	3333421	Open	CREDENTIAL ATTAINMENT  TEGL 10-16, Federal Data Validation Requirements, WIOA SEC 116	No credential attainment was entered in VaWC for the Medcerts program.  Case notes note id # 9127674 notes the MedCerts program was completed.	Credential attainment to be updated in VaWC	May 20 <sup>th</sup> 2022	Case Reassigned 5/20/2022
8	1031300	Exited	LOCAL CASE MANAGEMEN T & CASE NOTES POLICY  Notes must be recorded in database system within 10 days (if not sooner) after meeting with customer	Case notes not recorded in database system within 10 days:     Case Note ID: 9086133     Contact Date: 8/2/2021     Create Date: 12/21/2021  Case Note ID: 9086128     Contact Date: 8/10/2021     Create Date: 12/21/2021  Case Note ID: 9086130     Contact Date: 9/17/2021     Create Date: 12/21/2021  Case Note ID: 9086136     Contact Date: 12/21/2021  Case Note ID: 9086136     Contact Date: 10/29/2021     Create Date: 12/21/2021  Case Note ID: 9086140     Contact Date: 11/30/2021     Create Date: 12/21/2021		May 9 <sup>th</sup> 2022	N/A

				Case Note ID: 9086123 Contact Date: 12/2/2021 Create Date: 12/21/2021			
9	1031300	Exited	TRAINING SERVICES  20 CFR 680.410-420, WIOA Sec. 122 (b)(1)(D), WIOA Sec. 122 (b)(4)(A), WIOA Sec. 122 (a)(3),	There is no documentation in the case file to support ITA costs.	ITA to be saved in case file in VaWC	05/09/2022	Completed 5/15/2022
10.	1031300	Exited	Priority of Service	No Priority of Service form was noted in VaWC.	Priority of Service Form to be saved in VaWC.	05/09/2022	Completed 5/15/2022
11.	2328014	Open	ADULT EDUCATION AND LITERACY ACTIVITIES 20. CFR 680.350, WIOA Sec. 134(c)(3)(D)(X	Finding: AEL was not done in coordination with an allowable training activity. The participant was enrolled in GED program as prerequisite to Administrative Assistant Training. The case notes indicate that participant has enrolled in GED prep three times and has yet to pass the GED exam.	In subsequent contact with Client, Case manager to explore if possible to provide the following training services along with assistance in completing GED.  (a) Occupational skills training, including training for nontraditional employment; (b) OJT;	5/9/2022	2/27/2022 – Client signed up for OJT through ARPA WBL  On 5/9/2022, she enrolled in SkillUp Merit America for workplace training.

(c) Incumbent worker training	5/16/2022 -
(as described in §§ 680.780,	appointment to
680.790, 680.800, 680.810,	discuss admin
and 680.820);	asst training. I
(d) Programs that combined	will work with
workplace training and	business
related instruction, which may include	community & BSU Unit to find
cooperative education	OJT/WBL
programs;	5/18/2022:
(e) Training programs	Unable to meet
operated by the private	on 5/16/2022.
sector;	Client called on
(f) Skill upgrading and	5/18/2022) to
retraining; or (g) Entrepreneurial training.	inform CM that
(g) Entropronounce training	she has been
	accepted in
	ARPA and has
	started work
	with DCHS on
	5/16/2022,
	office support;
	she will be
	here for the
	next 8 weeks. I
	advised her
	that, if she is
	receives a
	permanent
	offer for a
	position with
	DCHS, the GED
	would be an
	asset. She also

							asked for my assistance in locating a tutor to assist her with the GED exam preparation. She plans to enroll at NVCC for an Administrative Assistant certificate in the fall.
12.	2328014	Open	AARWC WIOA Local Policy – Priority of Service	No documentation to support whether priority of service was considered for Title 1 WIOA Adult. No priority of service form on file .	Priority of Service Form to be saved in VaWC.	05/09/2022	COMPLETED. 5/15/2022
13.	2419609	Closed	BASIC CAREER SERVICES (that trigger participation only) 20 CFR 678.430, 20 CFR 680.150, TEGL 03-15, WIOA Section 134 (c)(2)(A)(i)-	No adult basic service activity entered although participant received supported services for work clothes.	Basic service activity codes to be updated in VaWC.	5/20/2022	Copleted 5/20/2022

			(xi), TEGL 19- 16				
14.	2419609	Closed	INDIVIDUALIZ ED CAREER SERVICES  20 CFR 678.430, WIOA Section 134 (c)(2)(A)(xii) and TEGL 03- 15	IEP not found in case file although code 205 was entered in the system.	A note to be made for the files for future monitoring purposes.	5/20/2022	IEP is in file
15.	2419609	Closed	WORK EXPERIENCE /INTERNSHIP 20 CFR Sec. 680.180, 680.190, 680.195 and 680.200, WIOA sec. 134(c)(2)(A)(xi i)(VII), WIOA sec 134(d)(5), and Local	No WE Training agreement found in case file.	WE Training agreement to be saved to VaWC.	5/20/2022	Competed 5/20/2022

			Workforce Service Plan				
16.	2419609	Closed	SUPPORTIVE SERVICES  20 CFR 680.900-970, WIOA Sec. 3 (59) and Sec. 134(d)(2)	No Supportive Service code entered in VaWC although documentation was found in case file.	VaWC activity codes to be updated for supportive services.	5/20/2022	Completed 5/20/2022

Note: \*Refer monitoring report for WIOA TEGL details for respective policy area.

WIOA Program Manager: Kat Ashmore

Name: Kat Ashmore

Signature: Katrina Ashmore

Date: 5/11/2022